



U.S. Department of Justice

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July 21, 2023

By ECF

Honorable Peggy Kuo
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Scott, et al. v. United States*, 19-cv-1075 (ERK) (PK)

Dear Judge Kuo:

This Office represents defendant United States of America in the above-referenced matter. On June 9, 2023, the parties filed a letter advising the Court that they had reached a tentative agreement regarding a proposed settlement framework governing the resolution of this action, and requested until June 23, 2023 in which to file a motion to stay this matter while the proposed settlement is effectuated. Dkt. No. 209. The Court granted the request. *See* Order dated June 13, 2023. The parties then determined that they required additional time to address various outstanding issues regarding the stay motion, and therefore, requested extensions of time until June 30, July 11, and July 21, 2023. Dkt. Nos. 210-212. The Court granted the parties' requests. *See* Orders dated July 3 and July 12, 2023. We now write on behalf of all parties to respectfully request a further extension of time, until August 21, 2023, in which to file the parties' anticipated joint motion to stay.

The reason for the requested extension of time is that the parties have encountered difficulty resolving the small number of particularly thorny issues referred to in the parties' last letter, *see* Dkt. No. 212, concerning the mechanisms by which the settlement process will be effectuated, which mechanisms are addressed in the stay motion. Notwithstanding, the parties remain optimistic that they can work through these issues with the requested additional time.

Accordingly, the parties respectfully request that the Court extend their time in which to file the motion to stay until August 21, 2023.

* * *

We thank the Court for its consideration of this matter.

Respectfully submitted,

BREON PEACE
United States Attorney

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cc: All counsel of record (by ECF)